

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA**

ALFA LIFE INSURANCE  
CORPORATION,

Plaintiff,

v.

ADVANTAGE CONSULTING  
GROUP, INC. and RICHARD E.  
KNUTSON,

Defendants.

Case No. CV-05-775-C  
UNOPPOSED

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ADVANTAGE CONSULTING  
GROUP, INC.,

Third-party Plaintiff,

v.

EDS SOLCORP,

Third-party Defendant

**UNOPPOSED MOTION TO EXTEND CERTAIN DEADLINES  
IN LIGHT OF TENTATIVE SETTLEMENT**

Advantage Consulting Group, Inc. moves this Court for an Order extending the expert disclosure deadlines as follows:

1. Pursuant to an April 3, 2007, Order (Doc. 68) granting Alfa Life Insurance Corporation's Motion for Mediation (Doc. 66), this case was ordered to mediation. On May 22 and 23, 2007, the parties participated in a two-day

mediation in Indianapolis, Indiana, that produced a tentative settlement that should resolve all matters pending before the Court. The settlement is contingent upon the exchange and review of certain information, which should occur within the next two weeks (i.e., by June 8, 2007).

2. Currently, this matter is set for trial on November 26, 2007. No extension of that date is sought by this motion.

3. However, Advantage Consulting Group is required to provide expert disclosures on or before June 1, 2007, and Third-party Defendant EDS Solcorp is required to provide expert disclosures on or before July 1, 2007. Requiring either party to prepare and finalize such disclosures would expose all parties to substantial fees and costs which should be unnecessary in light of the likely settlement of this action. In light of the pending settlement, Advantage moves that its expert disclosure deadline be extended until June 15, 2007, and that EDS Solcorp's expert disclosure deadline be extended until July 13, 2007.

4. Plaintiff Alfa Life Insurance Company and Third-Party Defendant EDS Solcorp have reviewed this motion and consent to the relief requested herein.

WHEREFORE, Advantage Consulting Group, Inc., with the consent of the other parties to this action, moves this Court for an Order extending the expert disclosure deadlines (and no other deadlines) as requested herein.

/s/ J. Forrest Hinton  
J. FORREST HINTON  
W. PATTON HAHN  
JAMES F. BARGER, JR.

Attorneys for Defendant/Third-party  
Plaintiff Advantage Consulting Group,  
Inc. and Defendant Richard E. Knutson

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### **CERTIFICATE OF SERVICE**

I hereby certify that on May 25, 2007, the foregoing was served via electronic service or United States first class mail on the following.

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/s/ J. Forrest Hinton  
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